

**BUCHANAN INGERSOLL & ROONEY PC**

Andrew Hope, Esq. (NY Bar Id. 4913547).  
Makenzie P. Leh, Esq. (*Pro Hac* Admission Forthcoming)  
640 5th Avenue, 9th Floor  
New York, New York 10019-6102  
215 665 5322 (o)  
Andrew.hope@bipc.com  
Makenzie.leh@bipc.com  
*Counsel for Trans Union, LLC*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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ELIMELECH GOLDSTEIN

CASE NO. :

Plaintiff,

vs.

CITIBANK, N.A., EQUIFAX INFORMATION  
SERVICES, LLC, and TRANS UNION, LLC,

Defendants.

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**TRANS UNION, LLC’S NOTICE OF REMOVAL**

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Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC (“TransUnion”) hereby removes the subject action from the Supreme Court of the State of New York, County of Kings to the United States District Court for the Eastern District of New York on the following grounds:

1. Plaintiff Elimelech Goldstein (“Goldstein”) is a natural person who resides in New York.
2. Defendant TransUnion is a Delaware corporation with its principal place of business in Illinois.

**NATURE OF CASE**

3. On August 30, 2024, Goldstein commenced this action in the Supreme Court of the State of New York, County of Kings, entitled *Elimelech Goldstein v. Citibank, N.A., et al.*, Index Number 523542/2024 via a Summons with Notice. A true and correct copy of the Summons with Notice is attached hereto as **Exhibit A**.

4. On October 9, 2024, Goldstein served TransUnion with a Summons with Notice filed in Supreme Court of the State of New York, County of Kings, Index Number 523542/2024. *See* Ex. A. No other process, pleadings, or orders have been served on TransUnion.

5. Goldstein makes claims under and alleges that TransUnion violated the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”) and General Business Law, 15 U.S.C. § 380-j(e) et seq. (the “GBL”). *See* Ex. A.

6. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

7. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Supreme Court of the State of New York, County of Kings, to the United States District Court for the Eastern District of New York.

8. Removal is timely under 28 U.S.C. § 1446 because this Notice of Removal is filed within 30 days after TransUnion’s receipt of a copy of the Summons with Notice, filed in the Supreme Court of the State of New York, County of King.

9. Attached hereto as **Exhibit B** is a copy of TransUnion’s Notice of Filing Notice of Removal to be filed in the Supreme Court of the State of New York, County of Kings Index Number 523542/2024.

10. Counsel for Equifax Information Services, LLC and Citibank, N.A., have consented to removal. Attached hereto as **Exhibit C** is a copy of the consent forms.

11. Notice of this Removal will promptly be filed with the Supreme Court of the State of New York, County of Kings and served upon all parties.

**WHEREFORE**, Defendant TransUnion, by counsel, removes the subject action from the Supreme Court of the State of New York, County of Kings to this United States District Court, Eastern District of New York.

Date: November 8, 2024

**BUCHANAN INGERSOLL & ROONEY PC**

/s/ Andrew G. Hope

Andrew G. Hope (NY Bar ID No. 4913547)

640 5th Avenue, 9th Floor

New York, New York 10019-6102

215 665 5322 (o)

Andrew.hope@bipc.com

*Counsel for Trans Union, LLC*